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Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CRISTIANO AMPARO, an individual;
ABEL MILLARES-ROJAS; an individual,

Plaintiffs,

v.

LEROY ROLDAN, an individual;
RYDER TRUCK RENTAL LT.; a Florida
corporation; UNITED STATES OF
AMERICA *ex rel* UNITED STATES
POSTAL SERVICE; DOE I through X;
and ROE CORPORATIONS I through X,

Defendants.

Case No. 2:24-cv-00394-JDA-BNW

**Stipulation to Extending Time for
Plaintiffs to File Amended Complaint
and Extending Federal Defendants Time
to Respond**

(First Request)

The Federal Defendants, the United States of America and LeRoy Roldan, and Plaintiffs, Cristiano Amparo, and Abel Millares-Rojas, stipulate (i) to extend the March 4, 2024, deadline for Federal Defendants to file a responsive pleading or motion and (ii) to the other terms herein. The parties stipulate that Plaintiffs will file and serve an Amended Complaint in this case no later than March 29, 2024, and Federal Defendants will file a response no later than April 26, 2024. This first request for an extension of time is supported by the points below.

Federal Defendants removed this case from Nevada state court pursuant to 28 U.S.C. §§ 1442(a)(1), 1446 on February 26, 2024. (ECF No. 1). Thereafter, the parties met and conferred regarding this matter.

1 Rule 81(c) of the Federal Rules of Civil Procedure results in a responsive deadline
2 of March 4, 2024, while federal actors usually have a 60-day response time under Rule
3 12(a)(2). Without prejudice to either party, this requested extension will allow the parties
4 additional time to confer about the case and provide Federal Defendants with additional
5 time to investigate this case before filing a responsive answer or motion. This is the parties'
6 first stipulation for an extension of time.

7 Respectfully submitted.

8 Dated: March 4, 2024

Dated: March 4, 2024

9 KURT LAMBETH, ESQ.
10 The Law Firm of Parke Esquire

JASON M. FRIERSON
United States Attorney

11 /s/ Kurt Lambeth
12 Attorney for Plaintiff

/s/ Ann Wilkinson
ANN WILKINSON
Assistant United States Attorney

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15 **IT IS SO ORDERED.**

16 

17 **UNITED STATES MAGISTRATE JUDGE**

18 **DATED:** 3/5/2024

Certificate of Service

I, Danielle Bleecker, Paralegal Specialist, hereby certify that on this 4th day of March 2024, a true and complete copy of the foregoing **Stipulation to Extending Time for Plaintiffs to File Amended Complaint and Extending Federal Defendants Time to Respond** was served to the following:

By ECF:

Kurt Lambeth, Esq.
THE LAW FIRM OF PARKE ESQUIRE
3111 S. Maryland Parkway
Las Vegas, NV 89109
Attorney for Plaintiffs

By First-Class Mail, postage prepaid,

Ryder Truck Rental, LT
c/o Commercial Registered Agent
Corporate Creations Network, Inc.
8275 South Eastern Avenue #200
Las Vegas, NV 89123

/s/ Danielle Bleecker
DANIELLE BLEECKER
Paralegal Specialist